

Federal Defenders OF NEW YORK, INC.

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December 27, 2021

Memo Endorse

12/27/21

OK

Colleen Mc McMahon

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Mario Martinez Beltran,**
21 Cr. 473 (CM)

Dear Judge McMahon:

I write to request that the Court temporarily modify the home-detention condition of Mr. Martinez Beltran's bail release in order to permit him to participate in his family's annual tradition of celebrating New Year's Eve in the home of his daughter's grandmother, Lilia Ramos, who lives a few blocks from Mr. Martinez Beltran. Specifically, we ask that Mr. Martinez Beltran be permitted to be out of his home from 9:00 p.m. on December 31 to 2:00 a.m. on January 1. Ms. Ramos' address has been provided to Pretrial Services.

Pretrial Services advises that it does not consent to social requests for defendants on home detention as a general policy matter. The government defers to Pretrial Services regarding this request.

Pretrial Services confirms that Mr. Martinez Beltran remains in compliance with his bail conditions since his arrest six months ago. Therefore, and in the absence of any reason why allowing Mr. Martinez Beltran to be with his family a few blocks from his home for a few hours on New Year's Eve would pose a risk of flight or danger to the community, the Court should grant him this kindness.

Respectfully submitted,
/s/

Clay H. Kaminsky
Assistant Federal Defender
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla
USPSO Jonathan Lettieri (by email)